MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT
Permit #OP2005-03

Permitting and Compliance Division
1520 E. Sixth Avenue
P.O. Box 200901
Helena, Montana 59620-0901

Ash Grove Cement Company
100 MT Highway 518
Clancy, Montana 59634

The following table summarizes the air quality programs testing, monitoring, and reporting requirements applicable to this facility.

Facility Compliance Requirements	Yes	No	Comments
Source Tests Required	X		
Ambient Monitoring Required		X	
COMS Required		X	
CEMS Required		X	
Schedule of Compliance Required		X	
Annual Compliance Certification and Semiannual Reporting Required	X		
Monthly Reporting Required		X	
Quarterly Reporting Required		X	
Applicable Air Quality Programs			
ARM Subchapter 7 Preconstruction Permitting	X		Permit #2005-07
New Source Performance Standards (NSPS)	X		Subpart F
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	
Maximum Achievable Control Technology (MACT)	X		Subpart LLL
Major New Source Review (NSR)		X	
Prevention of Significant Deterioration (PSD)		X	
Risk Management Plan Required (RMP)		X	
Acid Rain Title IV		X	
State Implementation Plan (SIP)		X	
Compliance Assurance Monitoring Plan (CAM)	X		Appendix F; Appendix G; Appendix H

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Section I. General Information

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emission units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the Environmental Protection Agency (EPA) and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in previous submittals and the renewal application submitted by Ash Grove Cement Company on April 23, 2003.

B. Facility Location

The facility is located approximately 5 kilometers south of East Helena and approximately 1.8 kilometers east of the Highway 518 and I-15 interchange near Montana City, Montana. The legal description is Section 12, Township 9 North, Range 3 West, in Jefferson County, Montana.

C. Facility Permitting History

Montana Air Quality Permit

Permit #**62-100169** was issued on July 9, 1969, to Kaiser Cement & Gypsum Corporation for a Joseph Goder Incinerator Model 7P-UD and a H-250-32 secondary gas burner.

Permit **#853-091775** was issued on September 8, 1975, to Kaiser Cement and Gypsum Corporation for a coal conversion fuel system on the nodulizing kiln. The permit was renewed on September 12, 1977, for a coal grinding plant.

Permit **#2005-00** was issued to Kaiser Cement & Gypsum Company to allow for the combustion of coke and coal in the kiln on July 11, 1986. Shortly thereafter, Ash Grove Cement Company purchased Kaiser Cement & Gypsum Corporation.

On July 13, 1991, Ash Grove Cement Company applied for Permit **#2005-01** to allow the facility to use hazardous waste derived fuel in the kiln. This application was subsequently withdrawn on November 15, 1995.

On June 16, 1996, Ash Grove Cement Company was issued Permit #**2005-02** for several construction projects at the facility. This permit allowed Ash Grove Cement Company to alter their existing primary crusher by replacing the 1962 Traylor Blake-Type jaw component rated at 345 ton/hr with a 1988 Hazemag horizontal impact component rated at 300 ton/hr. During this project Ash Grove Cement Company also proposed to upgrade dust collector DA-1. This upgrade consisted of replacing the existing Norblo reverse air shakerless dust collector with a BHA pulsejet conversion package. The flow through the baghouse increased from approximately 5500 (cubic feet per minute) cfm to 11,000 cfm as a result of this upgrade. In addition, Ash Grove Cement Company also proposed to alter the crusher discharge belt system during this project. A channel from belt conveyor designated FB-1 was installed to transport material leaving the primary crusher to the existing BC-1 conveyor. Drag conveyor #1 was abandoned and removed. Emissions from both the primary crusher and FB-1 are controlled by dust collector DA-1.

Ash Grove Cement Company upgraded the finish mill dust collection system (DA-9). This project replaced the existing Norblo DA shakerless dust collector with a BHA pulse jet conversion package. Two of the five compartments of this dust collection system have been dedicated to providing dust control to auxiliary equipment (DA-9 East), while the three remaining compartments have been dedicated to controlling emissions from the mill sweep function (DA-9 West). The existing 9200 cfm booster fan has been utilized as the DA-9 East discharge fan while an existing 14,300 cfm fan has been retained and modified and used as the DA-9 West discharge fan. This modification resulted in a flow increase of 9200 cfm.

Ash Grove Cement Company installed a new mixing system for cement kiln dust (CKD) management. This project is known as the turbulator project. The project consists of a 5-ton/hr turbulator that is used to wet CKD prior to its transport to the CKD monofill. This project resulted in a decrease in emissions because the CKD will now be wet prior to transport and the number of vehicle trips to the monofill per day are decreased.

Ash Grove Cement Company modified the petroleum coke feed system. This project involves installation of a 50 ton/hr Gundlach lump breaker in the existing coke hopper. The Gundlach lump breaker does not crush the coke, but rather it contains rollers that will separate the aggregated coke into individual coke nodules. There will not be an increase in emissions as a result of this project. As of June 17, 1997, the Gundlach lump breaker was not installed. Ash Grove Cement Company was required to begin construction by June 13, 1999, and proceed with due diligence until the Gundlach lump breaker is completed otherwise the authority to construct and operate the Gundlach lump breaker would be revoked.

Ash Grove Cement Company installed a second cement cooler in a parallel configuration to the existing cooler. This unit provided the facility with 100% standby capability if the primary cooler fails or is out of service for extended maintenance. The cooler system has been sized so that either cooler #1 or cooler #2 can handle the entire process throughput of the upstream air separator independently. Both coolers are operated simultaneously at reduced rates to improve product-cooling efficiency. There is not an increase in production or emissions as a result of this project, and both coolers are controlled by mill room dust collector DA-9 East.

Ash Grove Cement Company proposed to install a bucket elevator (BE-6) as a stand-by clinker transport method in the event drag conveyor DC-3 or apron conveyor AC-4 failed. Bucket elevator BE-6 may also be used for rail car loading of clinker in response to production shortages at other Ash Grove Cement Company plants. In addition, BE-6 may be used to transfer clinker to outdoor clinker storage piles in the winter during low shipping periods. BE-6 is capable of operating at 55 ton/hr and will be controlled by a new dust collector. The new dust collector will be called DA-19 and is a W.W. Sly model with a BHA pulse jet conversion. DA-19 will be operated at 2500 cfm. This project will result in a slight increase in emissions of approximately 0.18 ton/yr. As of June 17, 1997, BE-6 has not been completely installed. Ash Grove Cement Company was required to begin construction by June 13, 1999, and proceed with due diligence until the BE-6 is completed otherwise the authority to construct and operate the BE-6 would be revoked. In addition, during the permitting action Permit **#853-091775** was incorporated into Permit #2005-02.

On June 6, 1996, Ash Grove Cement Company applied for Permit **#2005-03** to install a 1980 belt conveyor (BC-0) rated at 200 ton/hr to remove clinker or crushed limestone from existing Storage Bin #3 or #5. Crushed limestone transported on this conveyor will be loaded into trucks for in-plant usage or customer sale. Clinker transported on this conveyor will either be loaded into trucks for stockpiling outside or loaded into rail cars for customer shipments. A 1000 cfm pulse jet baghouse (DA-20) will be used to control particulate emissions from the conveyor-to-truck material transfer point. This alteration will result in an increase in particulate emissions of 0.75 ton/yr. As of June 17,

1997, construction on BE-0 had not begun. Ash Grove Cement Company was required to begin construction by August 10, 1999, and proceed with due diligence until BC-0 is completed otherwise the authority to construct and operate BC-0 would be revoked.

On July 25, 1996, Ash Grove Cement Company applied for Permit **#2005-04** to allow the facility to place a 900 ton/hour portable primary crusher and associated material transfer equipment at the Clark's Gulch Quarry. Ash Grove Cement Company placed this application on hold and Permit #2005-04 was never issued.

On July 29, 1997, the Department revoked Permit #**62-100169**. The Joseph Goder Incinerator Model 7P-UD and a H-250-32 secondary gas burner are no longer at the facility.

On August 8, 1997, Permit **#2005-05** was issued to Ash Grove Cement Company to allow the facility to substitute 250 ton/year of post-consumer recycled glass for 250 ton/year of mined silica. The Department determined that this activity met the statutory definition of an incinerator contained in MCA 75-2-103 and the intent of House Bill 380; therefore, Ash Grove Cement Company was required to demonstrate that this activity posed no more than a negligible risk to human health and the environment.

On November 11, 1998, Permit **#2005-06** was issued to Ash Grove Cement Company for replacement of the existing Raymond air separator in the finish cement circuit with a new high efficiency separator. A 35,850 dry cubic feet per minute (dscm) pulse jet dust collector was proposed to control particulate emissions from the separator and to collect "on-spec" product. The product is forwarded on to cement cooler #2. Permit #2005-06 replaced Permit #2005-05.

On February 2, 2001, Permit **# 2005-07** was issued to Ash Grove Cement Company for the installation and operation of seven temporary, diesel-fired generators at their facility. These generators are necessary because the high cost of electricity has forced Ash Grove Cement Company to curtail operations at their facility. The operation of the generators would not occur beyond 2 years and was not expected to last for an extended period of time, but rather only for the length of time necessary for Ash Grove Cement Company to acquire a permanent, more economical supply of power. Permit #2005-07 replaced Permit #2005-06.

Title V Operating Permit

The original operating permit application was submitted July 12, 1995. Additional information was received October 7, 1996, October 16, 1996, March 25, 1997, June 13, 1997, June 26, 1997, and January 30, 1998. Permit **#OP2005-00** was effective October 24, 1998.

On October 6, 1998, Ash Grove Cement Company requested a significant modification to the operating permit to add the requirements for new equipment permitted in Permit #2005-06. The Department incorporated the requirements for the new equipment (a high efficiency air separator) into the operating permit. Permit **#OP2005-01** was issued July 10, 1999, and replaced Permit #OP2005-00.

On August 30, 2001, the Department received a letter from Ash Grove Cement Company requesting a de minimis change to Permit #2005-07 resulting from a modification of the existing Fuel Transfer (FT) Emitting Unit (EU). Ash Grove Cement Company also requested removal of any reference to the Gundlach Lump Breaker (FT-5). Documentation submitted to the Department by Ash Grove Cement Company indicated that the potential fugitive emissions of the proposed project would be less than the 15 tons per year de minimis threshold and would not violate any permit condition or cause or contribute to a violation of air quality standards. In addition, because the Gundlach Lump Breaker was never installed, the Department removed reference to the Gundlach Lump Breaker from the operating permit. Permit **#OP2005-02** replaces Permit #OP2005-01.

D. Current Permitting Action

On April 23, 2003, Ash Grove Cement Company submitted an operating permit renewal application. The current permit action includes that information and updates the permit. Permit **#OP2005-03** replaces Permit #OP2005-02.

E. Taking and Damaging Analysis

HB 311, the Montana Private Property Assessment Act, requires analysis of every proposed state agency administrative rule, policy, permit condition or permit denial, pertaining to an environmental matter, to determine whether the state action constitutes a taking or damaging of private real property that requires compensation under the Montana or U.S. Constitution. As part of issuing an operating permit, the Department is required to complete a Taking and Damaging Checklist. As required by 2-10-101 through 105, MCA, the Department has conducted a private property taking and damaging assessment and has determined there are no taking or damaging implications. The checklist was completed on September 15, 2004.

F. Compliance Designation

Ash Grove Cement Company was last inspected on October 26, 2004, and was found to be in compliance with all applicable rules and regulations.

Section II. Summary of Emission Units

A. Facility Process Description

The production of Portland cement begins at the quarry. For Ash Grove Cement Company, approximately 85 to 99 percent of the raw material used in the cement process are combined high and low-grade limestone quarried from Clark's Gulch quarry. Limestone rock and other raw materials are blasted and loaded onto trucks and transported to the crusher or to stockpiles. The raw materials are conveyed from the primary and secondary crushers and delivered by bucket elevator to the storage bins. From the storage bins, the raw materials are conveyed to the ball mill where the ore is ground with water to form a slurry and sent to storage tanks. In the tanks, the slurry is blended thoroughly before entering the kiln. Slurry is pumped to the uphill end of the kiln and heated, evaporating water from the slurry forming clinker.

The Ash Grove Cement Company plant uses a combination of natural gas, coal and/or coke, heavy oils and pitch as fuel sources for the clinker production. When the clinker leaves the kiln, it is cooled, transported by drag chains, pan conveyor and bucket elevator to the clinker bins or outside storage. From there, clinker and gypsum go to the finish ball mill, where it is ground together with gypsum to produce Portland cement. The final cement product is conveyed to storage silos where it is loaded into railroad cars, bulk trucks, or bagged and loaded onto trucks.

B. Emission Units and Pollution Control Device Identification

Section II of the operating permit contains a summary table of emission units and the corresponding pollution control device or practice.

C. Categorically Insignificant Sources/Activities

All emission units were identified as significant in operating Permit Application #OP2005-00. Only one emission unit, Petroleum Product Storage Tanks (PST) identified by the permittee in the operating permit application, was classified by the Department as an insignificant emissions unit. The renewal application for Permit #OP2005-03 moved several units from the significant emissions unit list to the insignificant emissions unit list based on the potential to emit of these units being less than 5 tons per year of any pollutant. The permittee is not required to update a list of insignificant emission units; therefore, the emission units and/or activities may change from those specified in Appendix A of the operating permit.

Section III. Explanation of Operating Permit Conditions

A. Emission Limits and Standards

Applicable requirements for significant emission units are listed after each emission unit. At the time of permit issuance, the requirements listed underneath each emission unit or group of emission units are believed to be the applicable requirements. The Department does not intend for the facility-wide conditions to supersede the applicable requirements listed below each emission unit or group of emission units.

The following conditions or compliance demonstrations in this operating permit were derived from Ash Grove Cement Company's Preconstruction Permit: Cement Kiln (Kiln) - Section III.G.1, 2, 4, 7, and 16; Convey/Primary Crushing (CPC) - Section III.D.2, 3, and 4; Transfer to/from Finish Mill (TFM) - Section III.N.2, and 3; Product Separator and Cement Coolers (PSC) - Section III.H.2 and 3; and Air Separator (AS) - Section III.B.1, 2, 3, 6, and 7. The authority for these conditions or compliance demonstrations is ARM 17.8.749 or ARM 17.8.752.

B. Monitoring Requirements

The Administrative Rules of Montana (ARM) 17.8.1212(1) requires that all monitoring and analysis procedures or test methods required by any applicable requirement to be contained in the operating permit. In addition, when the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source s compliance with the permit.

The requirements for testing, monitoring, recordkeeping, reporting and compliance certification, sufficient to assure compliance, do not require the permit to impose the same level of rigor for all emission units. Furthermore, they do not require extensive testing or monitoring to assure compliance with the applicable requirements for emission units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. When compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by lack of regular monitoring and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo (i.e., no monitoring) will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring for insignificant emission units.

The permittee can rely on the results of periodic monitoring to certify compliance. However, compliance with the monitoring requirements in the operating permit does not prohibit the use of other approved methods for determining compliance with an applicable emission limit or requirement. Furthermore, Ash Grove Cement Company will not be shielded from any enforcement action, even if the required monitoring methods listed in the permit indicates compliance with the applicable requirement, if an approved method demonstrates noncompliance.

The permit includes periodic monitoring or recordkeeping for each applicable requirement. The information obtained from the monitoring and recordkeeping will be used by the permittee to periodically certify compliance with the emission limits and standards. However, the Department may request additional testing to determine compliance with the emission limits and standards.

C. Test Methods and Procedures

The operating permit may not require testing for all sources if routine monitoring is used to determine compliance, but the Department has the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct compliance testing to confirm its compliance status. The Department determined the frequency of emission testing for particulate and opacity based on the potential to emit of each emission unit as well as the requirements applicable to each emission unit.

D. Reporting Requirements

Reporting requirements are included in the permit for each emission unit and Section V of the operating permit, "General Conditions", explains the reporting requirements. However, the permittee is required to submit semi-annual and annual monitoring reports to the Department and to annually certify compliance with the applicable requirements contained in the permit. The reports must include a list of all emission limit and monitoring deviations, the reason for any deviation, and the corrective action taken as a result of any deviation.

The air separator emission unit (AS) is subject to the requirements of 40 CFR 60, Subpart F - Standards of Performance for Portland Cement Plants and the notification and recordkeeping requirements of 40 CFR 60.7. Permit #2005-06 Section II.A.12 and Section II.D contain requirements for Ash Grove Cement Company to provide written notification of construction and start-up dates for the air separator. If the permittee complies with the requirements in Permit #2005-07 in Section II.D. 5, 6, and 7 (Section III.U.4, 5, and 6 of #OP2005-02) the notification requirements of 40 CFR 60.7(a) should be satisfied (40 CFR 60.7(f)).

E. Recordkeeping Requirements

The permittee is required to keep all records listed in the operating permit as a permanent business record for at least five years following the date of the generation of the record.

F. Public Notice

In accordance with ARM 17.8.1232, a public notice was published in the *Helena Independent Record* on October 6, 2004. The Department provided a 30-day public comment period on the draft operating permit from October 6, 2004, through November 8, 2004. ARM 17.8.1232 requires the department to keep a record of both comments and issues raised during the public participation process. The comments and issues received by November 8, 2004, will be summarized, along with the Department's responses, in the following table. All comments received during the public comment period will be promptly forwarded to Ash Grove Cement Company so they may have an opportunity to respond to these comments as well.

G. Draft Permit Comments: Permit #OP2005-03

Summary of Public Comments

The Department did not receive any public comments on draft Permit #OP2005-03.

Summary of Permittee Comments

Permit Reference	Permittee Comment	Department
Page 6, EU001 – Air Separator	This appears to be the old PSC-2 emitting unit from the old permit. PSC-2 had an opacity of 20%. EU001 has a 10% limit proposed	EU001 – Air Separator has a federally enforceable condition in the Montana Air Quality Permit (#2005-07) with a limit of 10% opacity.
Page 7, EU002 – Clinker Cooler	Please confirm that correct opacity limit is still 40%. The old multiclone was replaced with a baghouse DA-23 under a deminimis change	The opacity limit for the new baghouse is 20%
Page 9, EU003 – Convey/Primary Crusher (CPC)	The permit limit listed is .7% for opacity. This should read 7%	This correction has been made
Page 11, EU004 – Fuel Conveyors (FC)	This unit had a 20% limit in the old permit. There is not a baghouse associated with this unit	This change has been made
Page 12, EU004 – Fuel Transfer (FT)	This is a Radial Stacker. There are no structural enclosures associated with this unit	This unit's name and associated conditions have remained the same since permit #OP2005-02.
Appendix F – CAM Plan Kiln Stack ESP	I. Indicator. The current plan uses DVA to measure ESP Power. We believe Kw is the correct parameter and it is what we measure now. II. Measurement Approach. The equation should read P = V1I+V2I2+V3I3. The BHA system collects 6-minute total power values, sums them and averages hourly. IV. Performance Criteria E & F. Delete "block" to read: "Kw: record one hour average"	These changes have been made.
Appendix H – CAM Plan Clinker Cooler Stack Baghouse	Indicator Range. An excursion is defined as a daily average differential pressure of below 3 or above 10 inches of water pressure. An excursion triggers and inspection and possible corrective action. This baghouse currently runs normally at 3 inches of water column. Ash Grove proposes that the excursion trigger be set at 2 inches.	This change has been made.

Summary of EPA Comments

The Department did not receive any comments from the EPA on draft Permit #OP2005-03.

Section IV. Non-Applicable Requirements Analysis

The permittee did not specifically request a permit shield in operating Permit Application #OP2005-03. However, the Department granted a shield for all non-applicable requirements on a facility wide basis listed in section 8 of the original Permit Application #OP2005-00 that the Department agreed was non-applicable. The discussion below lists the requirements that the permittee identified as non-applicable and the reason(s) that the Department did not provide a shield for the requirement.

Table 4. Regulations Not Identified as Non-Applicable By the Department. *Table 4 lists the requirements that the Department did not provide a shield for the requirement*.

Reason	Rule Citation	
These rules do not have specific requirements for major sources because they are requirements for EPA or state and local authorities. These rules can be used as authority to impose specific requirements on a major source.	ARM 17.8.130 ARM 17.8.142 ARM 17.8.510 ARM 17.8.808 ARM 17.8.825 ARM 17.8.826 ARM 17.8.1108 ARM 17.8.1109 ARM 17.8.1210 ARM 17.8.1211 ARM 17.8.1212 ARM 17.8.1213 ARM 17.8.1214 ARM 17.8.1215 ARM 17.8.1225 ARM 17.8.1228 ARM 17.8.1231 ARM 17.8.1232	40 CFR 50 40 CFR 51 40 CFR 53 40 CFR 54 40 CFR 56 40 CFR 58 40 CFR 60, Subpart B 40 CFR 65 40 CFR 66 40 CFR 67
These regulations may not be applicable to the source at this time, however, these regulations may become applicable during the life of the permit.	ARM 17.8.120 ARM 17.8.121 ARM 17.8.131 ARM 17.8.140 ARM 17.8.141 ARM 17.8.316 ARM 17.8.511 ARM 17.8.514 ARM 17.8.515 ARM 17.8.611 ARM 17.8.612 ARM 17.8.701 *et seq.*	ARM 17.8.804 ARM 17.8.805 ARM 17.8.828 ARM 17.8.905 ARM 17.8.906 ARM 17.8.1005 ARM 17.8.1006 ARM 17.8.1007 ARM 17.8.1214 ARM 17.8.1222 ARM 17.8.1223 ARM 17.8.1224 ARM 17.8.1226 ARM 17.8.1227
This federal regulation has specific procedural requirements that may become relevant during the permit term.	40 CFR 61, Subpart M	
This rule contains requirements for regulatory authorities and not major sources; this rule can be used to impose specific	40 CFR 62	

Reason	Rule Citation	
requirements on a major facility.		
Rules that are always applicable to a major source and may contain specific requirement for compliance.	ARM 17.8.204 ARM 17.8.205 ARM 17.8.206 ARM 17.8.326	
These regulations are applicable requirements to specific emissions units; therefore, a facility wide shield will not be granted.	ARM 17.8.324 40 CFR 60, Subpart A 40 CFR 60, Subpart F 40 CFR 60, Subpart Y 40 CFR 60, Subpart OOO	
These rules include either a statement of purpose, applicability statement, regulatory definitions, or a statement of incorporation by reference. Therefore, facility wide permit shields will not be granted for these rules.	ARM 17.8.201 ARM 17.8.302 ARM 17.8.301 ARM 17.8.330 ARM 17.8.401 ARM 17.8.402 ARM 17.8.403 ARM 17.8.601 ARM 17.8.605 ARM 17.8.806 ARM 17.8.807 ARM 17.8.901 ARM 17.8.902 ARM 17.8.904	ARM 17.8.1103 ARM 17.8.1101 ARM 17.8.1001 ARM 17.8.1002 ARM 17.8.1004 40 CFR 52 40 CFR 61, Subpart A 40 CFR 63, Subpart A 40 CFR 63, Subpart B 40 CFR 63, Subpart D 40 CFR 63, Subpart E
Repealed Regulations	ARM 16.8.301 ARM 16.8.401 *et seq.* ARM 16.8.805 ARM 16.8.1104	ARM 16.8.1414 ARM 16.8.1419 ARM 17.8.1601 ARM 16.8.1904
Shields will not be granted for regulations that do not have specific requirements for major sources. These regulations contain requirements for state and local authorities.	MCA 75-2-101 *et. seq.* MCA 75-2-201 *et. seq.* MCA 75-2-301 *et. seq.* MCA 75-2-401 *et. seq.* MCA 75-2-501 *et. seq.*	42 U.S.C. Section 7412 42 U.S.C. Section 7651-7651o 42 U.S.C. Section 7414(a)(3) 42 U.S.C. Section 7429 42 U.S.C. Section 7511b(e) 42 U.S.C. Section 7511b(f) 42 U.S.C. Section 7671-7671q 42 U.S.C. Section 7661c(e)
These regulations are not applicable to the permittee pursuant to ARM 17.8.1201(10); a facility wide shield will not be granted.	40 CFR 55 40 CFR 79 40 CFR 69 40 CFR 80	

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT Standards

Ash Grove Cement Company is subject to 40 CFR 63, Subpart LLL-National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry. The compliance date for an owner or operator of an existing affected source is June 14, 2002. Ash Grove Cement Company requested the Department's concurrence to classify the Ash Grove -Montana City Plant as an "area source". In a letter dated February 25, 2002, the Department concurred that the Ash Grove -Montana City Plant was an area source under Subpart LLL. As identified in Subpart LLL, the kiln is subject to the dioxin and furan emission limits and the Particulate Matter Control Device (PMCD) inlet temperature-operating limit to control dioxin and furan emissions.

As of October 6, 2004, the Department is not aware of any other current or proposed MACT standards that are applicable to this facility.

B. NESHAP Standards

As of October 6, 2004, the Department is not aware of any current or proposed NESHAP standards that are applicable to this facility.

C. NSPS Standards

The air separator, bucket elevator (BE-6) and belt conveyor (BC-0) are subject to the requirements of 40 CFR 60, Subpart F - Standards of Performance for Portland Cement Plants.

As of October 6, 2004, the Department is not aware of any other current or proposed NSPS standards that are applicable to this facility.

D. Risk Management Plan

Currently, Ash Grove Cement Company does not exceed the minimum threshold quantities for any regulated substance listed in 40 CFR 68.115 for any facility process. Consequently, this facility is not required to submit a Risk Management Plan. If a facility has more than a threshold quantity of a regulated substance in a process, the facility must comply 3 years after the date on which a regulated substance is first listed under 40 CFR 68.130 or the date on which a regulated substance is first present in more than a threshold quantity in a process, whichever is later.